

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

David E. Mack,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	NO. 4:18-cv-00006-ALM-CAN
Experian Information Solutions, Inc.; Trans	)	
Union LLC; Equifax, Inc.; Equifax	)	
Information Services LLC,	)	
	)	
Defendants.	)	
	)	
	)	
	)	

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**JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER**

Plaintiff David E. Mack and Defendants Experian Information Solutions, Inc., Trans Union LLC, Equifax, Inc., and Equifax Information Services LLC (collectively referred to as the “Parties”) file this Joint Motion for Entry of Stipulated Protective Order (“Motion”) and would show the Court as follows:

1. Plaintiff David E. Mack filed the instant lawsuit against Defendants Experian Information Solutions, Inc., Trans Union LLC, Equifax, Inc. on January 3, 2018. *See* Docket No. 1.
2. On January 29, 2018, the Court entered its Order Governing Proceedings, *see* Docket No. 9, requiring the Parties to serve Initial Disclosures and to include a copy or description of documents that a party may use to support its claims or defenses.
3. Plaintiff David E. Mack filed a Motion for Leave to File an Amended Complaint on March 20, 2018, *see* Docket No. 34, which the Court granted on March 21,

2018, *see* Docket No. 37. The First Amended Complaint added Equifax Information Services LLC as a defendant in this action. *See* Docket No. 35.

4. The Parties agree that the documents and information relevant to the claims and defenses in this matter include, but are not limited to, trade secrets and confidential or proprietary information belonging to the Defendants and/or personal income, credit and other confidential information of Plaintiff.

5. Consequently, in order to protect the use, handling and disclosure of any such information that is produced or providing in this matter, the Parties request that the Court enter the Stipulated Protective Order attached hereto as Exhibit 1.

6. All Parties agree to the form and substance of the Stipulated Protective Order attached hereto as Exhibit 1, as evidenced by the signatures below.

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully request that the Court grant this Motion, and enter the Stipulated Protective Order attached hereto as Exhibit 1.

Dated: April 24, 2018

Respectfully submitted,

/s/David E. Mack

David E. Mack

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*Plaintiff, pro se*

/s/Autumn Hamit Patterson

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Trans Union LLC*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on April 24, 2018.

I further certify that I caused a copy of the foregoing document to be mailed and emailed to the following non-ECF participant on April 24, 2018:

David E. Mack  
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Dallas, TX 75252  
mack2001@swbell.net

/s/ Autumn Hamit Patterson  
Autumn Hamit Patterson